

# EXHIBIT C

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*Counsel for Defendants*  
*Distressed Asset Portfolio III, LLC and Unifund CCR, LLC*

SHAWN COSENZA, individually and on behalf of all other similarly situated,  Plaintiff,  v.  DISTRESSED ASSET PORTFOLIO III, LLC and UNIFUND CCR, LLC,  Defendant.	COURT OF COMMON PLEAS OF LACKAWANNA COUNTY, PENNSYLVANIA  CIVIL DIVISION  CLASS ACTION  Case No. 21-cv-306  <b>JURY TRIAL DEMANDED</b>
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**NOTICE OF FILING NOTICE OF REMOVAL**

To: Clerk of Judicial Records

Shawn Cosenza c/o  
Carlo Sabatini, Esq.  
Brett Freeman, Esq.  
Sabatini Freeman, LLC  
216 N. Blakely Street  
Dunmore, PA 18512

PLEASE TAKE NOTICE that the Notice of Removal attached hereto as **Exhibit 1** has been filed in the United States District Court for the Middle District of Pennsylvania, thereby removing this civil action to the Middle District of Pennsylvania pursuant to 28 U.S.C. §§ 1331, 1441, and 1446.

Respectfully submitted,

Dated: March \_\_\_\_\_, 2021

/s/

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*Counsel for Defendants Distressed Asset  
Portfolio III, LLC and Unifund CCR, LLC*

**CERTIFICATE OF COMPLIANCE**

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

Respectfully submitted,

Dated: March \_\_\_\_\_, 2021

\_\_\_\_\_  
/s/  
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*Counsel for Defendants Distressed Asset  
Portfolio III, LLC and Unifund CCR, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Notice of Filing Notice of Removal was served upon the following this \_\_\_\_\_ day of March, 2021 by U.S. Mail, First Class and E-Mail:

Carlo Sabatini, Esq.  
Brett Freeman, Esq.  
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Dunmore, PA 18512

*Counsel for Plaintiff Shawn Cosenza*

\_\_\_\_\_  
/s/  
Nicholas J. Godfrey, Esq.